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ATTORNEYS FOR DEFENDANTS

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**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH**  
**CENTRAL DIVISION**

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JOSHUA CHATWIN,

Plaintiff,

v.

DRAPER CITY; OFFICER J. PATTERSON,  
in his individual and official capacity;  
OFFICER DAVID HARRIS, in his individual  
and official capacity; OFFICER HEATHER  
BAUGH, in her individual and official  
capacity; and JOHN DOES 1-10,

Defendants.

**DEFENDANTS' RULE 26(a)(2) EXPERT  
DISCLOSURE**

Civil No. 2:14-cv-00375  
Judge Dale A. Kimball  
Magistrate Judge Pead

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Pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure and this Court's docket text Order of March 14, 2016, Defendants' Draper City, Joshua Patterson, David Harris and Heather Baugh, (collectively "Defendants") by and through their undersigned counsel, hereby submit their expert testimony disclosure.

1. Chris W. Lawrence  
ELGIN SECURITY CONSULTANTS, INC.  
22033 Elmwood Square  
St. Thomas, Ontario, N5R 6A1

Mr. Lawrence should be contacted through Defendants' counsel. Mr. Lawrence's signed Expert Report is attached hereto as Exhibit A, which includes his opinions, facts considered, curriculum vitae, history of publications and testimony, and his fee schedule.

There may be other expert witnesses that Defendants may use to support their claims and defenses, which are unknown to Defendants at this time. Defendants reserve the right to identify and disclose any additional expert witness(es) as necessary. Also, to the extent that Plaintiffs' anticipated rebuttal disclosures change Defendants' experts' disclosures in any way, Defendants reserve the right to modify their Rule 26(a)(2) disclosures accordingly, including the remittance of counter reports, as required.

Furthermore, as discovery is ongoing, should Defendants learn additional facts relevant to expert disclosures, these disclosures will be supplemented according to Fed. R. Civ. P. 26(e).

DATED this 14<sup>th</sup> day of April, 2016.

**DURHAM JONES & PINEGAR, P.C.**

/s/ R. Blake Hamilton

R. Blake Hamilton

Ashley M. Gregson

ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the forgoing was served this 14<sup>th</sup> day of April, 2016, via electronic filing, upon the following:

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